

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No. 05-326

DISTRICT OF MASS.

TIMOTHY HILLS  
Plaintiff

v.

TOWN OF STOUGHTON  
Defendant

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05-10488-JLA

**ANSWER OF DEFENDANT, TOWN OF STOUGHTON**

1. The Defendant admits the allegations contained in Paragraph 1 of Plaintiff's Complaint.
2. The Defendant admits the allegations contained in Paragraph 2 of Plaintiff's Complaint.
3. The Defendant admits the allegations contained in Paragraph 3 of Plaintiff's Complaint.
4. The Defendant neither admits nor denies the allegations contained in Paragraph 4 of Plaintiff's Complaint.
5. The Defendant denies the allegations contained in Paragraph 5 of Plaintiff's Complaint.
6. The Defendant neither admits nor denies the allegations contained in Paragraph 6 of Plaintiff's Complaint.
7. The Defendant denies the allegations contained in Paragraph 7 of Plaintiff's Complaint.
8. The Defendant denies the allegations contained in Paragraph 8 of Plaintiff's Complaint.
9. The Defendant denies the allegations contained in Paragraph 9 of Plaintiff's Complaint.
10. The Defendant denies the allegations contained in Paragraph 10 of Plaintiff's Complaint.
11. No Answer Required.
12. The Defendant denies the allegations contained in Paragraph 12 of Plaintiff's Complaint.
13. No Answer Required.

14. The Defendant denies the allegations contained in Paragraph 14 of Plaintiff's Complaint.
15. No Answer Required.
16. The Defendant denies the allegations contained in Paragraph 16 of Plaintiff's Complaint.
17. No Answer Required.
18. The Defendant denies the allegation contained in Paragraph 18 of Plaintiff's Complaint.
19. No Answer Required.
20. The Defendant denies the allegation contained in Paragraph 20 of Plaintiff's Complaint.
21. No Answer Required.
22. The Defendant denies the allegations contained in Paragraph 22 of Plaintiff's Complaint.
23. No Answer Required.
24. The Defendant denies the allegations contained in Paragraph 24 of Plaintiff's Complaint.
25. No Answer Required.
26. The Defendant denies the allegations contained in Paragraph 26 of Plaintiff's Complaint.

WHEREFORE, the Defendant respectfully requests that this Honorable Court dismiss the Plaintiff's Complaint and find judgement in their favor together with attorneys' fees, costs and such other relief as this Court deems just and proper.

**DEFENDANT DEMANDS A TRIAL BY JURY ON ALL ISSUES.**

**AFFIRMATIVE DEFENSES**

1. The Defendant says that the Plaintiff's Complaint fails to state a claim upon which relief can be granted and, therefore, moves for dismissal of this action pursuant to Mass. R. Civ. P. 12(b)(6).
2. The Defendant states that the process of Plaintiff was insufficient and, therefore, Defendant moves for dismissal under Mass. R. Civ. P. 12(b)(4).
3. The Defendant states that the service of process of Plaintiff was insufficient and, therefore, Defendant moves for dismissal under Mass. R. Civ. P. 12(b)(5).